

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No. 05-249 (JLL)
v.	:	Hon. Jose L. Linares
MARCI PLOTKIN	:	
STANLEY BEKRITSKY	:	
RICHARD STADTMAUER, and	:	<u>NOTICE OF MOTION</u>
ANNE AMICI	:	

TO: Justin P. Walder, Esq.  
K. Roger Plawker, Esq.  
Lin Claire Solomon, Esq.  
Walder, Hayden & Brogan  
5 Becker Farm Road  
Roseland, NJ 07068-1727

Richard J. Schaeffer, Esq.  
Brian Rafferty, Esq.  
Dornbush Schaeffer Strongin & Venaglia LLP  
747 Third Avenue  
New York, NY 10017

Robert S. Fink, Esq.  
Kostelanetz & Fink, LLP  
530 5th Avenue, 22nd Fl.  
New York, NY 10031

Edward J. Plaza, Esq.  
Weir & Plaza LLC  
321 Broad Street  
Red Bank, NJ 07701

PLEASE TAKE NOTICE that Christopher J. Christie, U.S. Attorney for the District of New Jersey (Thomas J. Eicher and Rachael A. Honig, Assistant U.S. Attorneys, appearing) will move on a date to be set by the court, before the Honorable Jose L. Linares, United States District Judge, at the Martin Luther King, Jr. Federal Building & Courthouse, 50

Walnut Street, Newark, New Jersey, for an order quashing the subpoenas *duces tecum* issued to the Internal Revenue Service in this matter.

In support of this motion, the United States relies upon the attached Memorandum.

Respectfully submitted,

CHRISTOPHER J. CHRISTIE  
United States Attorney

s/Thomas J. Eicher

By: THOMAS J. EICHER

s/Rachael A. Honig

By: RACHAEL A. HONIG  
Assistant U.S. Attorney

Dated: November 20, 2007

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No. 05-249 (JLL)
v.	:	Hon. Jose L. Linares
MARCI PLOTKIN	:	
STANLEY BEKRITSKY	:	
RICHARD STADTMAUER, and	:	<u>ORDER</u>
ANNE AMICI	:	

This matter having come before the Court on the motion of the United States (Thomas J. Eicher and Rachael A. Honig, Assistant U.S. Attorneys, appearing), in the presence of defendants Marci Plotkin (by Justin P. Walder, K. Roger Plawker, and Lin Claire Solomon, Esqs.), Stanley Bekritsky (by Richard J. Schaeffer and Brian Rafferty, Esqs.), Richard Stadtmauer (by Robert S. Fink, Esq.), and Anne Amici (by Edward J. Plaza, Esq.), for an order quashing the subpoenas *duces tecum* issued to the Internal Revenue Service in this matter; and the Court having considered the motion and the arguments of the parties; and for good cause shown,

IT IS on this    day of            , 2007,

ORDERED that the motion of the United States is GRANTED; and it is

FURTHER ORDERED that the subpoenas issued to the Internal Revenue Service by defendants Richard Stadtmauer and Marci Plotkin shall be, and hereby are, quashed.

---

HON. JOSE L. LINARES  
United States District Judge